

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

TYRONE P. JAMES  
Plaintiff,

v.

YORK COUNTY POLICE DEPARTMENT,  
JAMES H. MORGAN, RICHARD PEDDICORD,  
RAYMOND E. CRUAL, GENE FELTS,  
DET. KESSLER, CO. BAYLARK,  
RANDY SIPES, BRIAN WESTMORLAND,  
and DETECTIVE GLOWCZESKI  
Defendants.

CIVIL ACTION NO. 1:01-CV-1015

(Judge Kane)

JURY TRIAL DEMANDED

**FILED**  
HARRISBURG, PA

FEB 11 2004

MARY E. D'ANDREA, CLERK  
Per [Signature]  
Deputy Clerk

PLAINTIFF'S MOTION FOR A PROTECTIVE ORDER

AND NOW COMES, plaintiff's, Tyrone P. James, pro-se, hereby respectfully, moves this Honorable Court, pursuant to Fed.R.Civ.P. 26(c); Rule 65 (a) of the Federal Rules of Civil Procedure, enjoining the defendants, their successors i office, agents and employees and all other persons acting in concert and participation with them, for a protective order which will defer "Deposition;" Defendants seeks leave of Court to depose Plaintiff in this matter; filed with the Court January 12, 2004, until such time, that the Court rules on that Motion to Compel Discovery; And For appointment of counsel, to represent Plaintiff's, in this civil matter and for purpose of Deposition. Plaintiff's, request appointment of counsel, for deposition hearing, for purpose of self-incrimination, plaintiff's criminal matter still pending on direct appeal relating to this matter; and the fact that, plaintiff's could say things which could be used against him in criminal prosecution. See U.S. Constitution, Amendment 5.

As is more fully set forth in Plaintiff's supporting brief which is being filed separately; the relief sought here is warranted given the procedural posture of this matter; upon complaint supporting affidavit of plaintiff's and memorandum of law submitted.

WHEREFORE, a protective order to such effect should be Granted.

Respectfully submitted,

Tyrone James, EX9451

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TYRONE P. JAMES

Plaintiff,

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YORK COUNTY POLICE DEPARTMENT,  
JAMES H. MORAN, RICHARD REDDICORD,  
RAYMOND E. CRUAL, GENE PELLIS,  
DET. KESSLER, CO. BAYLARK,  
RANDY SIPIES, BRIAN WESTMORLAND,  
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CERTIFICATION OF SERVICE

I, Tyrone P. James, Plaintiff's hereby certified that, I am this day serving a true and correct copy to assigned counsels, a "Plaintiff's Motion For Protective Order; Motion For Appointment Of Counsel," in the manner set forth below to the followings:

By First Class U.S. Mail

Jason C. Giurintano  
Office Of Attorney General  
Civil Litigation  
15th Floor, Strawberry Square  
Harrisburg, PA 17120

Donald L. Reihart, Esq.,  
Law Office Of Donald L. Reihart  
3015 Eastern Avenue  
York, PA 17402

Date: February 8, 2001.

±

*Tyrone James*

Tyrone James  
EX 9451  
P.O. Box A  
Bellefonte, PA 16823-0821.